

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE

STEPHEN EIMERS, as Personal Representative of the  
ESTATE OF HANNAH EIMERS, Deceased

Plaintiff,

v.

Case No. 1:19-cv-00044-RLJ-SKL

VALMONT INDUSTRIES, INC., et al.

Defendant.

**MOTION FOR ADMISSION PRO HAC VICE**

Lindsay Corporation, Lindsay Transportation Solutions Sales & Service,  
The undersigned, counsel for LLC, and Lindsay Transportation Solutions Inc. f/k/a Barrier Systems, ,  
moves for admission to appear in this action *pro hac vice*.

Pursuant to E.D. Tenn. L.R. 83.5(b)(1). **FILING FEE = \$90.00**

I am a member in good standing of the highest court of the following state,  
territory or the District of Columbia (list **ALL** states):

PENNSYLVANIA and NEW JERSEY

AND I am a member in good standing of another U.S. District Court. A  
certificate of good standing from the DISTRICT court is attached. ).

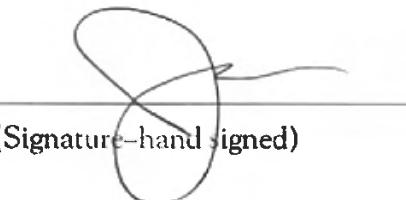
**OR**

Pursuant to E.D. Tenn. L.R. 83.5(b)(2). **NO FILING FEE REQUIRED.**

An application for my admission to practice in this Court is currently pending.

I declare under penalty of perjury that the foregoing is true and correct.

Date: *2/28/19*

  
(Signature-hand signed)

Name: James Harris Heller

Firm: Cozen O'Connor

Address: 1650 Market Street, Ste. 2800, Philadelphia, PA 19103

Email address: JimHeller@cozen.com

Once your motion is granted, you must register for a CM/ECF account at  
<http://www.tned.uscourts.gov/RegistrationForm.php>.

DATED this 4th day of March, 2019.

Respectfully submitted,

BAKER, DONELSON, BEARMAN, CALDWELL  
& BERKOWITZ, P.C.

s/ Brigid M. Carpenter

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*Attorneys for Lindsay Corporation, Lindsay  
Transportation Solutions Sales & Service, LLC,  
and Lindsay Transportation Solutions, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel for the party listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party:

Theodore J. Leopold  
Leslie M. Kroeger  
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2925 PGA Boulevard, Suite 200  
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Gregory F. Coleman  
Adam A. Edwards  
Justin Day  
Greg Coleman Law PC  
800 S. Gay Street, Suite 1100  
Knoxville, Tennessee 37929

this 4th day of March, 2019.

s/ Brigid M. Carpenter



## CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA  
EASTERN DISTRICT OF PENNSYLVANIA

}

I, Kate Barkman, Clerk of the United States District Court for the Eastern District of Pennsylvania,

**DO HEREBY CERTIFY** that James H. Heller, Bar #44980, was duly admitted to practice in said Court on December 2, 1985, and is in good standing as a member of the bar of said Court.

  
Kate Barkman  
KATE BARKMAN  
Clerk of Court

BY:   
Aida Ayala  
Deputy Clerk

DATED at Philadelphia, Pennsylvania  
on February 26, 2019

